

### **REMARKS**

The present application includes pending claims 16-47, all of which have been rejected. By this Amendment, claims 16 and 32 have been amended as set forth above.

Claims 22 and 38 were rejected under 35 U.S.C. 112, second paragraph because the claims from which they depended indicated that the media peripheral is coupled to a second system at a second location. Claims 16 and 32 have been amended to overcome this rejection. Thus, the Applicants respectfully request reconsideration of this rejection.

Claims 16, 19-21, 23, 25, 27, 29-32, 35-37, 39, 41, 43 and 45-47 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. 7,237,029 ("Hino") in view of U.S. 6,446,192 ("Narasimhan"). Claims 17-18, 26, 28, 33-34, 42 and 44 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Hino in view of Narasimhan and U.S. 2004/00030501 ("Krz"). Claims 24 and 40 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Hino in view of Narasimhan and U.S. 6,363,434 ("Eytchison"). The Applicants respectfully traverse these rejections for at least the following reasons:

#### **I. The Rejection Of Claims 16, 19-21, 23, 25, 27, 29-32, 35-37, 39, 43 and 45-47**

The Applicants first turn to the rejection of claims 16, 19-21, 23, 25, 27, 29-32, 35-37, 39, 41, 43 and 45-47 as being rendered unpatentable by Hino and Narasimhan. Independent claim 16 recites, in part, "A method for **automatically monitoring** at least one media peripheral via a communication network, the method comprising... **automatically determining authorization for monitoring** of the at least one media peripheral...." Independent claim 32 recites, in part, "One or more circuits for a media processing system supporting **automatic monitoring** of at least one media peripheral via a communication network, the one or more circuits comprising: one or more processors communicatively coupled to the communication network, the one or more

processors operable to, at least... **automatically determine authorization for monitoring** of the at least one media peripheral.”

The Applicants previously demonstrated that Hino does not describe, teach or suggest the following limitations that are recited in independent claim 16:

- A method for **automatically monitoring** at least one media peripheral via a communication network;
- **automatically** establishing a **communication link** between a first system and at least one media peripheral;
- **automatically determining authorization for monitoring** of the at least one media peripheral; and
- **automatically monitoring**, by the first system, at least one status parameter of the at least one media peripheral, if the authorization is successful.

Similarly, Hino does not describe, teach or suggest the following limitations that are recited in independent claim 32:

- One or more circuits for a media processing system supporting **automatic monitoring** of at least one media peripheral via a communication network, the one or more circuit comprising: one or more processor communicatively coupled to the communication network, the one or more processor operable to, at least:
- **automatically** establish a **communication link** between the first system and the at least one media peripheral;
- **automatically determine authorization for monitoring** of the at least one media peripheral; and
- **automatically monitor**, by the first system, at least one status parameter of the at least one media peripheral, if the authorization is successful.

Indeed, the current Office Action acknowledges that “Hino does not explicitly indicate automating the connection to the peripheral.” See January 31, 2008 Office Action at page 4. Moreover, the current Office Action does not show that Hino describes, teaches or suggests the various automated limitations noted above. See *id.*

at page 3. In order to overcome the deficiencies noted above, the Office Action cites Narasimhan at column 5, lines 46-55. *See id.*

The cited portion of Narasimhan recites, however, the following:

A web browser or Java virtual machine (JVM) is not required, however, for the client 30 to access a device 34. The present system supports use of additional standard internet capabilities and protocols. Therefore, custom client software can access the equipment directly using standard "sockets." Such software can be developed using conventional programming tools, e.g., BSD Sockets (Unix) or Winsock (Windows). The client 30 also could be an automated application program that collects data from remote devices 34 via the Internet 32. In this way a single client could collect usage data and control thousands of remote devices.

Narasimhan at column 5, lines 46-56. As shown above, this portion of Narasimhan states that the client 30, which is connected to the network, can be an "automated application program that collects data from remote devices 34 via the Internet 32." Thus, a single client could collect usage data, through the automated program, and control thousands of remote devices. While this portion of Narasimhan merely indicates that usage data may seemingly be automatically collected, it does not describe, teach or suggest, however, at least:

- **automatically** establishing a **communication link** between a first system and at least one media peripheral;
- **automatically** **determining authorization for monitoring** of the at least one media peripheral; and
- **automatically** **monitoring**, by the first system, at least one status parameter of the at least one media peripheral, if the authorization is successful.

Again, the cited portion merely suggests that the client may automatically collect usage data of a remote device, and through that automatically collected data, may control the remote device. It does not describe, teach or suggest, however, "automatically establishing a communication link," "automatically determining authorization for

monitoring” and/or “automatically monitoring at least one status parameter of the at least one media peripheral, if the authorization is successful.”

Narasimhan broadly states that the “network interface chip manages connections from remote clients automatically, requiring no intervention from the device control circuitry” (see *id.* at column 11, lines 21-23), but “managing” a connection is not the same as “automatically establishing a connection,” “automatically determining authorization,” or “automatically monitoring” if the authorization is successful.

Narasimhan also discloses that the “network interface chip can be configured to automatically open a client or server socket upon power-up.” See *id.* at column 18, lines 31-33. While a client or server socket may be automatically opened, the Applicants respectfully submit that this does not equate to **automatically establishing a communication link between a first system and at least one media peripheral.**”

As noted above, Hino does not describe, teach or suggest the various automated steps recited in the claims. The Office Action seems to acknowledge as much. See January 31, 2008 Office Action at pages 3-4. Further, the portion of Narasimhan that the Office Action relies on also does not describe, teach or suggest these limitations. Even if one were to assume that the Narasimhan discloses “a program that automatically connects to the controlled devices and receives status information to monitor these devices,” as asserted by the Office Action at page 4 (but which the Applicants do not assume), the Office Action has not shown that either of the cited references describes, teaches or suggests “**automatically determining authorization**” to monitor a media peripheral and “**automatically monitoring**” at least one status parameter of the media peripheral if the authorization is successful. Thus, for at least these reasons, the Applicants respectfully request reconsideration of the claim rejections.

## **II. The Remaining Rejections**

The Applicants respectfully request reconsideration of the rejection of dependent claims 17-18, 24, 26, 28, 33-34, 40, 42 and 44 for at least the reasons discussed above.

### III. Conclusion

In general, the Office Action makes various statements regarding the pending claims and the cited references that are now moot in light of the above. Thus, the Applicants will not address such statements at the present time. The Applicants expressly reserve the right, however, to challenge such statements in the future should the need arise (e.g., if such statements should become relevant by appearing in any future rejection).

The Applicants respectfully request reconsideration of the claim rejections for at least the reasons discussed above. If the Examiner has any questions or the Applicants can be of any assistance, the Examiner is invited to contact the undersigned attorney.

The Commissioner is authorized to charge any necessary fees, or credit any overpayment to the Deposit Account of McAndrews, Held & Malloy, Account No. 13-0017.

Respectfully submitted,

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